EXECUTIVE REPORT
HAZARDOUS WASTE TRACKING SYSTEM (HWTS) AND RELATED HAZARDOUS WASTE PROCESSES

In California, the heart of "cradle-to-grave" managing and tracking of hazardous waste is DTSC's Hazardous Waste staff, processes and the HWTS. In response to problems, the Legislature adopted Senate Bill 660 (1997) to provide $1 million to develop HWTS as a replacement for systems started in 1982. The current business process is inadequate, understaffed, vulnerable, and does not adequately support core DTSC hazardous waste and fee activities. No single organization or manager is responsible or accountable for all hazardous waste business processes or for managing those services to its customers.

HWTS Statistics: Each year HWTS tracks over 450,000 hazardous waste shipments including data and images from over 900,000 manifests. Each year, the Generator Information Services Section (GISS) uses HWTS to verify over 100,000 ID numbers, to issue and inactivate over 12,000 ID numbers and to register 1,000 transporters. HWTS displays 2 million plus tons of California generated waste. The public, CUPAs, and DTSC staff use it to find handler information and check manifest data and generates 2.5 million hits a month. HWTS stores over 20 million manifest images. HWTS data supports collection of $28 million in fees a year.

A. ISSUES RELATED TO WEI/MECCA

1. **HWTS should flag manifests which indicate waste is being sent to an unpermitted California facility. Reports should identify unregistered transporters.** (TSIS Lead with EERP)
    - Create or modify reports to quickly identify unpermitted facilities and unregistered transporters.

2. **EERP should monitor reports and mine HWTS data to identify violations and improve available reports for targeting and identifying patterns.**
    - Re-establish the position of Manifest Enforcement Coordinator and add at least one additional field staff to follow up and take enforcement.

3. **HWTS data quality is poor, with up to 40% of manifest records containing at least one error.** (EERP and TSIS).
    - Develop short and long term strategies to improve data quality.
    - Errors are found in ID numbers, tonnage volumes, waste codes and handling codes.
    - Consult with customers to evaluate and prioritize data errors.

B. CRITICAL OR CHRONIC SYSTEMATIC HWTS PROBLEMS

1. **Reduced GISS staffing level is inadequate to manage HWTS data. Manifest correction staff was cut from 3 PY + students to 1 PY. The**

large numbers of "false positives" hampers GISS' ability to identify and contact illegal handlers.

- Provide 3 additional PY through filling or redirection for manifest correction and business process improvements.
- Programmers help could implement efficiencies, such as issuing IDs on line, to release more analysts and technicians for data quality and system efforts.

2. **Minimal TSIS data analyst time is available to identify large violators or create ad hoc reports for internal DTSC customers, system maintenance, and public requests (i.e. public records act requests). (TSIS and EERP-GISS)**
   - Refill a vacant TSIS data analyst position to support HWTS.

3. **Existing HWTS code is old and not supported for patches or updates. HWTS needs to meet DTSC application development standards.**
   - This will require 2 PY of OEIM staff. This would consume all of the current OEIM HWTS support staff. Request for other reports or modifications could be impacted. Existing resources are required to support associated functions such as processing Fees data.

4. **Current reports do not display load rejections and hazardous waste of concern shipments (weaponizable wastes) data.**
   - EERP will work with TSIS to design reports to display needed enforcement data.
   - Enforcement resources to review and follow up on problems identified in the reports.

5. **Reporting RCRA waste vs. total waste is needed to prioritize work and list RCRA large quantity generators. Few reports display total tonnage in categories needed for macro analyses. RCRA wastes generated or disposed of in California are not segregated for specific analysis.**
   - Establish a customer group to advise OEIM and prioritize needs.
   - Assign or add programmers to modify or create reports or set up a report generator to allow staff to create their own reports. Resource requirements need to be identified.

6. **Customer data analysis is often unavailable in a timely manner. It is not generally included in any workplan or duty statement. Examples include: WEI customer and waste code analysis, modeling potential fee legislation, evaluating fee performance, and macro capacity assessment and pollution prevention targeting.**
   - Resources are needed to design studies and models using the data. This goes beyond pulling the raw data.
   - DTSC needs staff trained and available to do these projects as they arise, but current staff person will soon retire.

- Work should be staffed and assigned to one entity as lead.

7. **Some time this decade, U.S. EPA plans to develop electronic manifests (E-manifesting) with a national manifest data and image repository. Legislation recently passed the US Senate. The impact on HWTS and DTSC's manifest requirements is still unknown, but will impact the direction or need for HWTS. This project has been under development for years but adoption and implementation dates are hard to predict.**
    - Closely monitor and advise federal e-manifesting law. Patch HWTS and delay a total redesign of HWTS until federal direction is clear.
    - Plan for a significant redesign of HWTS during the roll out of the new federal system. Resource needs are unpredictable at this time.

8. **An updated HWTS Business Process analysis could serve as a context for maintaining and improving HWTS to meet and prioritize customer needs and prepare for E-manifesting.**

Attachments

- Manifest
- Diagram of Manifest Distribution
- EPA ID Number Form
- Transporter Registration Form
- List of HWTS Reports

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